

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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Dean Langford and Nancy Langford,		)	
husband and wife,		)	
		)	
Plaintiffs,		)	
		)	
v.		)	Civil Action No. 03CV12245RCL
		)	
Zimmer, Inc. and Zimmer Holdings, Inc.		)	
		)	
Defendants.		)	
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**ASSENTED-TO MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 83.5.3(b), the Defendants Zimmer, Inc. and Zimmer Holdings, Inc. (together "Zimmer"), by and through their counsel, respectfully move this Court to admit Albert J. Dahm, *pro hac vice*, as co-counsel for Zimmer in the above-captioned matter. In support of this Motion, Zimmer states as follows:

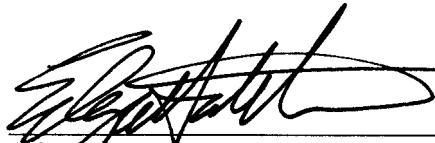
1. Mr. Dahm has been admitted to practice in the bars of the State of Indiana, California and Arizona and is a member in good standing of those bars. *See* Affidavit of Albert J. Dahm ("Dahm Affidavit"), submitted herewith, at ¶ 2.
2. There are no disciplinary proceedings pending against Mr. Dahm in the State of Indiana, California, Arizona, or in any other jurisdiction in which Mr. Dahm is admitted to the bar. *See* Dahm Affidavit at ¶ 3.
3. Mr. Dahm has obtained a copy of the Local Rules of this Court and has familiarized himself with those Local Rules. *See* Dahm Affidavit at ¶ 4.
4. Mr. Dahm is familiar with Zimmer, Inc. and Zimmer Holdings, Inc. and the issues of this lawsuit. *See* Dahm Affidavit at ¶ 5.

5. The undersigned movant is an attorney with Day, Berry & Howard LLP and a member in good standing of the bar of this Court.

6. Counsel for the Plaintiff, Paul Sullivan, has assented to this motion.

**WHEREFORE**, the Defendants, Zimmer, Inc. and Zimmer Holdings, Inc., by and through their counsel, move this Court to admit *pro hac vice* Albert J. Dahm for the purpose of participating as co-counsel for Zimmer in this litigation.

Respectfully submitted,  
Zimmer, Inc. and Zimmer Holdings, Inc.,  
By their attorneys,



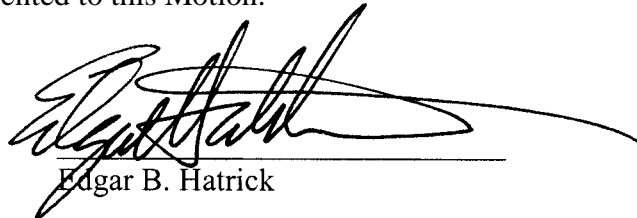
Dated: March 17, 2004

Edgar B. Hatrick (BBO #647166)  
DAY, BERRY & HOWARD LLP  
260 Franklin Street  
Boston, MA 02110  
(617) 345-4600

Francis H. Morrison III (BBO #645515)  
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**CERTIFICATION**

Pursuant to Local Rule 7.1(A)(2), I, Edgar B. Hatrick, hereby certify that counsel for the plaintiffs have been conferred with and have assented to this Motion.



Edgar B. Hatrick

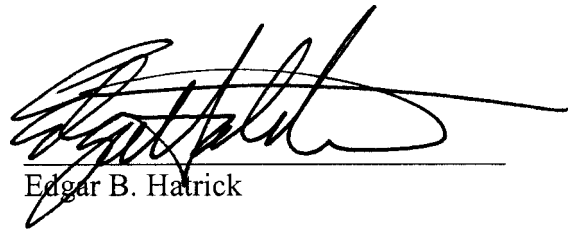
**CERTIFICATE OF SERVICE**

I, Edgar B. Hatrick, do hereby certify that on this 17th day of March, 2004, I have served by first-class U.S. Mail a copy of the foregoing Assented-To Motion for Admission Pro Hac Vice upon plaintiff's counsel at the following addresses:

Wm. Gerald McElroy, Jr.  
Paul T. Sullivan  
**Zelle, Hofmann, Voelbel, Mason & Gette LLP**  
950 Winter Street, Suite 1300  
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Edgar B. Hatrick

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DISTRICT OF MASSACHUSETTS

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Civil Action No. 03CV12245RCL

Zimmer, Inc. and Zimmer Holdings, Inc. )

Defendants. )

**AFFIDAVIT OF ALBERT J. DAHM**

I, Albert J. Dahm, affirm:

1. I am a partner in the law firm of Dahm & Elvin, LLP, 9604 Coldwater Road, Suite 201, Fort Wayne, Indiana 46825, telephone number (260) 497-6001.

2. I am in good standing in every jurisdiction in which I have been admitted to practice. I am a member of the bar of the State of Indiana, the State of California and the State of Arizona. I have also been admitted to the bar of the United States District Court for the Northern and Southern Districts of Indiana, the bar of the United States District Court for the District of Arizona, the United States District Court for the Northern, Eastern, Central and Southern Districts of California, the United States District Court for the Western District of Wisconsin and the United States Court of Appeals for the Third and Fourth Circuits.

3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

5. I am familiar with Zimmer, Inc. and Zimmer Holdings, Inc., ("Zimmer") and the issues in this lawsuit. My appearance and participation in conjunction with attorneys from Day, Berry & Howard LLP are necessary for the proper and effective representation of Zimmer in this matter.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March (2004.

J<sup>i</sup>/

Albert J. Dahm